

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**B.R., et al.,**

Plaintiffs,

-VS-

**Brian McGivern, et al.,**

Defendants.

**CASE NO.: 4:13-cv-907**

**JUDGE: JOHN R. ADAMS**

**NOTICE TO TAKE VIDEOTAPE  
DEPOSITION OF ROBERT P.  
NALETT**

Per agreement of counsel, please take notice that on **Thursday, February 24, 2015, at 1:00 p.m., EST**, Plaintiffs will take the videotaped deposition of Robert P. Nalett in the above captioned matter, upon oral examination, pursuant to the provisions of the Federal Rules of Civil Procedure, before a court reporting firm, notaries public or before some other officer authorized by law to administer oaths.

The above deposition will be taken at the offices of **Alliance Reporting, 2700 North Central Avenue, Suite 350, Phoenix, AZ 85012, ph#602-230-8448**, via videoconference through the office of **Mehler & Hagestrom, 101 W. Prospect Avenue, Suite 1750, Cleveland, OH 44115, tel. (216) 621-4984**, and the oral examination will continue from day to day until completed. A copy of the subpoena for his attendance is attached hereto and incorporated herein by this reference.

No later than February 23, 2015, the witness is to provide a copy of his entire file on this matter, including but not limited to drafts of his/her report, copies of any documents reviewed and relied upon by him in formulating his opinions in this matter, correspondence from Defendants' counsel which provided facts, data or assumption that

he relied upon or considered in forming his opinions and copies of invoices/billing statements submitted for work performed.

Respectfully Submitted,

/s/ Robert F. DiCello

**Robert F. DiCello (0072020)**

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/s/Steven M. Goldberg and J. Michael Goldberg

**Steven M. Goldberg (0041344)**

**J. Michael Goldberg (0046685)**

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Respectfully Submitted,

/s/ Robert F. DiCello

**Robert F. DiCello (0072020)**

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